

Over 138,000 towers are registered in the U.S. and their impact has caused the death of millions of song birds and other migratory birds. There seem to be many variables that contribute to the mortality levels, including tower height, placement and lighting of the towers and attached guy wires but there has not been a systematic research plan and review process.

I believe that the FCC should take note of this problem and put the following policies in place:

- institute a research program, funded by the communications industry, to identify tower placement, design and lighting conditions that result in bird mortality;
- establish a systematic review of communication tower and bird mortality issues;
- undertake environmental reviews of all existing towers to assess their placement and design with regard to migratory bird impacts;
- require that all proposed towers be subjected to rigorous environmental reviews;
- and implement immediate protections based on existing knowledge, such as the voluntary tower siting and placement guidelines developed by the U.S. Fish and Wildlife Service.